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COUNSEL

Nov 30 3 02 PM '98

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November 24, 1998

Via Fax: (202) 219-3923

Ms. Alva Smith
Federal Election Committee
999 E. Street N.W.
Washington, D.C. 20463

RE: Complaint MUR 4818
Walt Roberts

Dear Ms. Smith:

Enclosed please find the Response of Walt Roberts for Congress to the Complaint in the referenced matter.

If there is anything else you need or any additional information you require in this regard, please let me know.

Very truly yours,



G. Michael Blessington

GMB/cjs

Enclosure

Nov 30 3 02 PM '98

Walt Roberts for Congress Committee

Walt Roberts

MUR # 4818

COMES NOW, the Walt Roberts For Congress Committee and Chris Clark, as treasurer and provides a response to the complaint filed herein.

A. The purported complaint does not comply with the requirements of the Code of Federal Regulations § 111.4, 2 U.S.C. 437g (a)(1) in the following particulars:

- (1) The complaint does not differentiate between statements based upon personal knowledge and statements based upon information and belief as required by CFR § 111.4 (c);
- (2) The complaint does not clearly identify each person or entity who is alleged to have committed a violation as required by CFR § 111.4 (d)(1);
- (3) The complaint does not contain a clear and concise recitation of facts which describe a violation of a statute or regulation over which the Commission has jurisdiction as required by CFR § 111.4 (d)(3);

B. The document filed and purporting to be a Complaint is no more than a litany of campaign rhetoric by the Republican members of the Oklahoma Congressional delegation designed to embarrass Walt Roberts and his campaign. There is only a list of newspaper

C. Neither Walt Roberts, Chirs Clark, the Walt Roberts for Congress Committee nor any other person associated with the Walt Roberts campaign has violated any statute or regulation over which the Commission has jurisdiction and this complaint should be summarily dismissed.


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